



“Life of the Case” Analysis

Interstate Compact on Placement of Children (ICPC)

1. OUTCOMES

- ☐ Child safety across state lines
- ☐ Timely Permanency for Children

The Interstate Compact on the Placement of Children (ICPC) is statutory uniform law in all 50 states, the District of Columbia and the U.S. Virgin Islands. The Compact is intended to ensure the protection of children who are placed across state lines for foster care and adoption and to ensure that, when placed; appropriate responsibility and communication among all parties involved will remain until lawful Compact termination. Procedures for the interstate and intercountry placement of children are intended to ensure that the proposed placement is not contrary to the interests of the child and are in compliance with state laws and regulations. IC 12-17-8 is the state statute which governs the ICPC in the state of Indiana and speaks to the requirements under the compact.

The placement of children across state lines and securing the supervision needed to ensure those placements are safe presents a unique challenge to the Department of Child Services (DCS) because the laws of both states must be taken into account. The timely placement of children into permanent homes is a key outcome for the DCS. Yet the ICPC process is often burdened with delays due to staff shortages and workload demands, lack of understanding of the ICPC on the part of the staff, and inefficiencies and inconsistencies in data systems. In addition, local office staff tends to perceive the cases involving local placement and other activities as a much higher priority than cases involving ICPC, even though there are over 2500 children currently placed as a result of the Indiana ICPC office's activities (both within the state and in other states). All of these factors impact the timeliness of the placement approval process. One Subject Matter Expert (SME) indicated there are ICPC approvals in Indiana that have been pending since 2003.

Summary

The ICPC is designed to ensure appropriate placement, services and supervision of all children placed out of state. Indiana staff responsible for handling ICPC cases faces backlogs due to staff shortages and data system shortfalls. The growing number of relative and adoptive placements into and out of Indiana as will continue to significantly impact the ICPC, so addressing delays and barriers in the ICPC process and its supporting data systems will be important to the outcome of ensuring timely permanency for children.

2. CRITERIA

- ☐ Child Under 18 Years of Age
- ☐ Placement Type Subject to ICPC Approval
- ☐ Sending Entity's Relationship to the Child Consistent with ICPC Mandates
- ☐ Receiving State's Licensing Laws Accepted by the Sending State
- ☐ ICPC Requirements Completed by Both Sending and Receiving States

The following types of placements for children under the age of 18 are subject to approval by the ICPC when placement is sought across states lines, either into or out of the state of Indiana:

- ☐ Adoption (Wardship or Guardianship, International and Independent);



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- ☐ Foster Care;
- ☐ Change of Status from a Foster Care to Adoption Placement;
- ☐ Parent or Relative Placements (when the child is under jurisdiction of a state agency);
- ☐ Group Homes, Residential Treatment Facilities and Institutions;
- ☐ Residential Placements Made by Parents; and
- ☐ Regulation 7 Priority Placement (any placement except for licensed or approved foster care or adoption may be determined by a court to be a priority placement).

According to IC 12-17-8-1 Article VIII, a placement may be excluded from the ICPC if the placement of a child is made voluntarily between the following persons who are related to the child, as long as no court or other competent authority has custody of the child, or any other interstate compact is in effect:

- ☐ Parent (s)
- ☐ Stepparent
- ☐ Grandparent(s)
- ☐ Adult brother or sister
- ☐ Adult aunt or uncle
- ☐ Non-agency legal guardian (non-adoption referrals only)

In order to place a child out across state lines, the sending state must agree to accept all of the receiving state's licensing laws. Both states must fulfill all of the requirements of the ICPC in order for the placement to be made legally.

Summary

Although the ICPC criteria and process for the ICPC are standardized at the national level and detailed in Section 5 of the Child Welfare Policy Manual, it is a process that local office staff rarely master because interstate placements are the exception, not the rule. Although there is a dedicated ICPC staff (of 3) located in Central Office, many of the actual ICPC requirements are fulfilled at the local office level. As the ICPC regulations are designed to protect children in out-of-home placements, promote permanency, and to guarantee the provision of services they would receive as if placed in their home state, all staff involved in ICPC activities should have clear, concise decision support and supervisory oversight to ensure all ICPC requirements are met.

3. ACTIVITIES

- ☐ Gather and Organize Appropriate Referral Information
- ☐ Analyze Referral Information Against Criteria
- ☐ Make Decision
- ☐ Supervisory Review and Quality Assurance
- ☐ Handoff / Case Transfer
- ☐ Documentation

Because the ICPC is meant to regulate the placement of children across state lines, when necessary for clarity, activities will be analyzed from two perspectives: *Indiana as Sending State* (placing Indiana children in other states) and *Indiana as Receiving State* (children being placed in Indiana from other states). Under the ICPC, the sending state maintains jurisdiction of the child; however, the



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receiving state is responsible for approving the placement request and providing negotiated ongoing case management and oversight once the child is placed within the receiving state's borders.

During the ICPC request and approval process, official communication between states occurs via each state's ICPC office, with the ICPC offices then communicating with their own local offices. In practice, local offices in both states do communicate directly with each other in certain circumstances; however, the ICPC offices remain officially responsible for coordinating and fulfilling ICPC mandates.

Gather and Organize Appropriate Referral Information

Indiana as Sending State

When an Indiana local office or other agency initiates an ICPC request, all information required for the request is collected by the requesting entity and referred to the ICPC office in hard copy. The requirements relating to what must be in the referral packet differ by the placement type, but all referral packets contain a completed State Form 100A *Interstate Compact on the Placement of Children Request*. Although the actual information that must be collected and submitted to ICPC offices is mandated by the ICPC and spelled out in state policy, SMEs have indicated that documentation requirements relating to each type of ICPC placement are still unclear.

After receiving the referral from the local office and verifying the completeness, the ICPC office forwards the request to the receiving state, as dictated by ICPC regulations. When Indiana is the sending state, there is no policy requiring data entry into the ICWIS ICPC module at the local office. If used correctly, ICWIS will actually populate the 100A and 100B forms when workers enter information into the ICPC module, but because it is not a policy requirement to use ICWIS at this stage, everything is currently done in hard copy. These hard copies are sent to the ICPC office, where ICPC staff enter data into ICWIS and an Access database, which is a tracking mechanism approved by the APSHA.

Indiana as Receiving State

When Indiana is the receiving state, the request and supporting documentation is forwarded to Indiana's ICPC office from the sending state's ICPC office. Indiana ICPC verifies the completeness of the referral and data enters in the Access database and opens an ICPC Intake in ICWIS (in a process similar to a regular Indiana Child Protective Services Intake). The request is then forwarded to the Indiana local office representing the desired placement. Local office staff must then conduct a home study relating to the placement in question and determine whether the placement is suitable. Home studies are completed for all placements. If the placement requested is a relative or other foster care, the home must also become licensed before the child can be placed. Though the ICPC section of the Child Welfare Policy Manual does not specifically address licensing issues, practice dictates that relatives and foster homes must become licensed prior to obtaining ICPC approval of the placement. If the placement request is for residential placement, Indiana ICPC sends requests directly to the Child Caring Institution or Residential Treatment Facility. There is no assessment or home study completed for these types of placements, since they must already be licensed to be in operation.

Once they have completed their assessment, local offices send the results in the required format back to Indiana ICPC to notify the referring state of the status. At this stage, local offices are required by policy to perform some data entry in ICWIS. The local offices will approve or deny the ICPC Intake in ICWIS and transfer the Intake back to the Indiana ICPC office. The ICPC staff then open the case in the Case Management module in ICWIS, and transfers the case back to the supervisor for assignment.

SMEs indicated that the ICPC module is complicated and cumbersome for local office staff, and data entry requirements are not clear. In addition, ICWIS provides only for data entry in the ICPC module of cases in which placements in agency adoptive, foster care, relative care or parent placements are being requested. ICWIS does not provide for data entry of probation children, international or independent adoption cases. Formal ICWIS training, other than the Computer Assisted Training, has not



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been provided, data entry requirements differ depending on whether Indiana is the sending or receiving state, and accountability for ensuring the information is entered into the system is currently non-existent.

Analyze Information against Criteria

Indiana as Sending State

When Indiana is the sending state, analysis of the appropriateness and completeness of the ICPC referral is done at both the local office and the ICPC office levels. The Indiana ICPC staff use tools they have created to determine whether the referral contains all of the required information for different types of placements. According to the SMEs, local offices may have their own tools to assist them in determining whether all ICPC criteria are met for the desired placement, or may use the criteria in Section 5 of the Child Welfare Policy Manual. The ICPC office will review the referring entity's referral packet, request additional information as necessary, and then forward the request to the receiving state's ICPC office. Because there are no standard quality assurance processes or checklists used, this constitutes a duplication of effort.

Indiana as Receiving State

The Indiana ICPC office is the first to review a referral from out of state. Once the ICPC referral packets are received in the Indiana ICPC office from the sending state's ICPC office, cases are entered into the Access database and in ICWIS. Then they are delivered to the two consultants who divide the alphabet in half for assignment. The case is then reviewed to ensure the referral contains all information that is required for the particular placement request, and that the request meets the criteria of the ICPC. Though a referral may need to include additional information, the ICPC staff may forward the request on to the appropriate Indiana local office so as not to delay the process. The referring state's ICPC will then be contacted related to the missing information. There is no timeframe in ICPC or Indiana policy detailing the submission of requested information.

The Indiana ICPC office has established practice to process a referral within 5 days; however, this is not in state policy. By practice, the ICPC consultant will process referrals in the following order of importance:

- ☐ Regulation 7 placements (by ICPC regulation, must be referred to local agency within 48 hours)
- ☐ Independent / International Adoptions
- ☐ Residential Facilities
- ☐ All other placement types

The local office will review the request, and complete the necessary home study and licensing requirements (Indiana will not place an out of state child in an unlicensed home). Local offices follow the same licensing processes for ICPC requests as they do with in-state licensing requests. Although licensing was not included in the life of the case analysis project, research on licensing performed by Sequoia Consulting Group in another context revealed that the decision support tools, technology support, and policy clarity are concerns in this area as well, which impacts the ICPC process at the local office level.

Making a Decision

Indiana as Sending State

Once ICPC becomes involved with a case, the decision to place a child out of state has already been made. The only true decisions at this phase relate to whether or not the placement meets the criteria of the ICPC, and whether all required documents and information are included in the referral



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packet. Once this is complete, the decision-making process is complete when Indiana is the sending state.

Indiana as Receiving State

Indiana's ICPC must decide whether the referral meets the requirements of the ICPC, and whether the referral packet is complete. Local offices then bear the responsibility for deciding whether or not the requested placement meets Indiana's placement requirements, and complete the licensing process. The local office has few case management decisions to make at this stage; decisions are limited specifically to whether or not certain placement criteria are met, whether services are recommended to make the placement successful, and whether the home meets licensing requirements.

According to ICPC regulations and DCS policy, the receiving state has a "recommended" period of 30 working days from the receipt of the referral to conduct the home study assessment and make a decision on the placement request. However, due to workloads and staffing issues, SMEs indicated this deadline is almost never met.

Local offices inform the ICPC office of their decisions regarding the placement by returning the signed 100A form, and include any necessary supporting information. Depending on the decision, specific ICWIS updates are also made. The ICPC office is responsible for notifying the referring state's ICPC office of the decision. Though ICPC regulation and DCS policy call for the use of hardcopies for notification of approval or denial, the decision is usually communicated by email or phone, followed by the hard copy documentation for expediency.

Supervisory Review and Quality Assurance

There is no state policy or practice regarding local or agency supervisory review of ICPC referrals, or timeframe in which missing information must be provided. State policy is also moot on the issue of supervisory review of ICPC homestudies, or the placement approvals or disapproves by local office or agency staff. Both issues are concerning given an incomplete referral or homestudy can both significantly contribute to a child's delay in achieving permanency.

Since there is no local office Quality Assurance review, all Quality Assurance activities take place in policy and practice in the Indiana ICPC office after the referral has been received and/or processed. Although the ICPC supervisor does perform some Quality Assurance activities for her Central Office consultants, it is not a consistent, formalized process.

Handoff / Case Transfer

Referrals from the local agencies to their respective ICPC office are usually made by US mail. Lack of an automated system for the transfer of referral information is an identified inefficiency. However, due to the ICPC regulation to send multiple hard copies of ICPC documentation to parties, and the need to incorporate documents that are not able to be transmitted via email, such as court orders, any ability to address this efficiency is diminished until the APSHA adopts regulations in keeping with today's technologies.

ICPC regulations and DCS practice dictate that each communication must be made through use of a transmittal form, generated by the sending and receiving state's ICPC offices. Transmittals are cover sheets that are attached to the communication, information or documents being forwarded from one state to another. States' increase in availability of email has lessened the need for all communication to be accompanied by a transmittal, simplifying the communication process. This change of practice has also resulted in local offices in both states being permitted to contact one another directly in some instances, rather than working through the state ICPC offices.



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One clear deficiency in ICPC regulations and State policy is in the area of timeframes for submission of information to the ICPC office. If a referral is missing information, or additional documentation is required, ICPC offices notify the appropriate party, but there is not policy surrounding the timeframe in which that request must be fulfilled. Because ICPC is often low on the list of priorities, information can be delayed for long periods, effectively preventing children from being placed into long-term, appropriate homes.

Documenting the Decision

Whether Indiana is the sending or receiving state, decisions are documented using a dual-tracking process, using both the APHSA Access database and ICWIS. Though SMEs noted that the Access database is comprehensive and easy to use, local offices do not have access to the information within the database, since it is strictly an ICPC office tool. The ICWIS ICPC module is not easy to use, and training is not provided for local office staff outside of the Computer Assisted Training for independent use by staff. Information may or may not be entered into the ICWIS ICPC module, and in fact, entry into the system is only functionally possible only on certain types of cases: ICWIS does not provide for data entry of probation children, international or independent adoption cases. This is a concern, given that decisions related to workload; funding and other issues are based on information from the ICWIS system.

In addition, Indiana can enter an “ICPC Intake” in the ICWIS ICPC module only when Indiana is the receiving state. This means that there is better tracking of children coming into Indiana than there is for children being placed in other states. These limitations and the fact that data entry into ICWIS is not supported by policy result in little accountability or supervisory oversight of data tracking, and subsequently, a dearth of reliable information about ICPC available at the Statewide level.

Addressing the use of ICWIS for ICPC could alleviate some of the manual requirements currently imposed on local office staff completing ICPC referrals. SMEs indicated that in some cases, local office staff will actually print out blank copies of the 100A and 100B forms from ICWIS, and hand-write the required information onto the printouts. If data were actually entered into the system, staff could print the populated forms directly from ICWIS instead of hand-writing them. This process would be superior to the current one, in that data would be captured and stored in a system accessible to all.

According to SMEs, Indiana previously pursued an interface between the Access database and the ICWIS system to avoid duplicate systems and provide access of necessary information to all relevant staff. It has been reported that the federal government did not approve such an interface, as the Access database was not included in the original design of the ICWIS system. At this time, revisiting this issue or exploring enhancements to the ICWIS ICPC module would greatly benefit DCS by increasing access to information and streamlining workloads.

Summary

The specific activities required in the ICPC process are dictated by compact regulations, and outlines in detail in Section 5 of the Child Welfare Policy Manual. But given the number of different requirements for the various placement type requests and the infrequency of ICPC placements, individual staff has difficulty completing requirements accurately, in a timely manner. There are currently no standard decision support tools to assist staff at any level in determining the documentation needed for submission of the referral, or the number of copies that the staff must send (other than the Child Welfare Policy Manual). Not only does staff lack reliable decision support tools, but policy related to timeframes to complete key tasks in the process is absent. The lack of decision support tools, lack of supervisor quality assurance and lack of timeframe requirements for key steps in the process can significantly contribute to a child’s delay in achieving permanency. In addition, the dual tracking system leads to excess burden, with local office staff completing documents by hand, which later must be transferred into both the Access and ICWIS system. This also limits the availability of accurate data relating to ICPC in Indiana.



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4. DECISIONS

- ☐ Compliance with ICPC Requirements
- ☐ Approval of Placement Recommendation
- ☐ Case Management after Placement
- ☐ Case Closure

Compliance with ICPC Requirements

The first key decision in the ICPC phase of the life of the case is whether ICPC criteria are met, and the referral is complete. As each placement type calls for a different set of documents to support the referral, this is a key point in the decision-making process. Due to staff's lack of knowledge regarding referral requirements, this is one of the major sources of delay. The ICPC staff review each referral sent to Central Office and make this determination, requiring a good deal of their time. Clear decision support tools, including checklists for each type of referral, would assist local office staff in completing referral packets, and would assist ICPC staff in the review process.

Approval of Placement Recommendation

Once the local office or agency completes the home study, the ICPC office will review it to ensure it meets the state and agency requirements and is appropriate for the type of case and request. According to the SMEs, there is little supervisory involvement or quality assurance of the home study before it is returned to the ICPC office. Moving quality assurance to the local level would eliminate the amount of review required by ICPC staff, and would minimize the amount of time wasted due to missing or incomplete information requests. The same tool used to assist staff in completing requirements could be utilized by supervisors in the quality assurance process.

Case Management after Placement

The 100A will detail the type, duration and intensity of services required by the child being placed out of state. Although the sending state must maintain legal responsibility for the child, the receiving state provides supervision of the placement and if necessary, ongoing services. Agreement is made by the states about the types of services to be provided, and the frequency of progress reports to be made to the sending state. There are certain circumstances when specific decisions must be made outside of the realm of normal "case management" activities:

Placement Disruption

When problems arise with a child's out of state placement, both states are generally involved in this process of deciding how to respond. If the situation has risen to the point that services will not salvage the placement, the local office or agency will decide whether the child must be returned to the sending state. In some situations, respite care may be available until the situation can be resolved and the child placed back in the home. However, any other permanent placement made in the receiving state would require a new referral.

When a child's placement disrupts, and the child is under the jurisdiction of an Indiana court, the court must be immediately made aware of the situation. As with any child under the jurisdiction of a juvenile court, the judge must authorize the child's removal from the placement, unless it is an emergency situation. To ensure the child's safety in the receiving state in times of disruption, the court and staff in both states must all work together to ensure the child's well-being.



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Illegal Placements

If a child is placed out of state before the ICPC process is completed by an agency or order of the court, or if a child is placed in a home where the placement has been denied, the placement is considered “illegal”, according to the ICPC regulations and IC 12-17-8, Article IV. Illegal placements happen often due to the delays and logistical issues arising from the ICPC process, and pose significant problems for both the sending and receiving state. Children placed in inappropriate and/or unsupervised placements and therefore at risk for further abuse or neglect is obviously the most significant concern of an illegal placement.

Case Closure

According to ICPC regulations and DCS policy, the case of a child placed across state lines may only be closed with the concurrence of both states’ ICPC offices. This regulation is designed to assure the child’s safety. This decision is made by the ICPC offices when supporting documentation is submitted by the local agencies that the permanency goal for the child has been met and the court has dismissed its jurisdiction, or the child is no longer placed out of state.

Summary

In the ICPC phase in the life of the case, the decision-making responsibilities are more clearly defined than they are in other phases, because most activities are governed by compact guidelines. Decisions center around whether the placement meets compact criteria, whether all compact requirements are met, and whether the requested placement is suitable. Policy provides guidance for these decisions, however, due to the fact that the requirements themselves differ significantly by the type of case, and because workers in the field do not complete ICPC activities on a regular basis, user-friendly, standardized decision support tools are needed to support decision making, minimize errors, and streamline the process of placing children in appropriate homes.

5. HAND-OFFS/CASE TRANSFER

- ☐ Sending State Local Agency to Sending State ICPC
- ☐ Sending State ICPC to Receiving State ICPC
- ☐ Receiving State ICPC to Receiving State Local Agency

- ☐ Receiving State Local Agency to Receiving State ICPC
- ☐ Receiving State ICPC to Sending State ICPC
- ☐ Sending State ICPC to Sending State Local Agency
- ☐ Sending State Local Agency and Receiving State Local Agency

Due to the construction of the ICPC regulations, there are a large number of handoffs, all of which pose the risk of delaying placement. Although APHSA has approved the Access database, and many states use SACWIS systems to facilitate the ICPC, the majority of the handoffs that occur are physical, requiring the mailing of forms from one office to another. Use of technology such as email has helped streamline this process, but the compact still requires the exchange of hard-copy information in order to fulfill its mandates.



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Indiana can control the handoffs and amount of time required to process ICPC referrals for the activities that occur within state borders; however, we must rely on other states to process Indiana referrals, and must also rely on other states to provide necessary information for children coming into Indiana. Delays in other states can be minimized if Indiana ensures that all required information is provided to other states in a timely and efficient manner; however, it is not possible for the Indiana ICPC office to exert much influence over routine ICPC activities in other states.

Within Indiana, the handoff from local agency to the ICPC office is the first, often problematic stage in the ICPC process. Delays are caused by incomplete referrals, lack of policy requirements addressing timeframes for submitting missing information, and the fact that the ICWIS system is not fully utilized as a means of capturing and transferring information. Since most states, including Indiana, can take up to a year or more to complete home studies, further delays caused by incomplete referrals are detrimental to a child's right to a permanent home.

Though the timeliness of the handoff from an Indiana local office to the Indiana ICPC can be improved significantly with the development of simple decision support tools, the time involved in the handoff from Indiana ICPC to a local agency for a homestudy assessment is more difficult. This phase in the ICPC life of the case is the phase that most delays occur. The ICPC regulations recommend a homestudy be completed within 30 business days, however, this rarely happens. Home study decisions can take anywhere from 6 months to over one year.

The lack of one consistent data tracking system for Indiana ICPC cases affects the efficiency in which handoffs proceed between the Indiana local offices and the ICPC office. Only a small portion of cases is actually entered into the ICWIS system, due to the system's inability to process all types of placements involved in ICPC. Data for cases that are eligible for access into the system are generally not entered by local office due to the ICPC module being cumbersome and complicated. As the Access database serves the ICPC office as the main tracking system, dual entry becomes necessary for ICPC staff into both systems. If the ICWIS module was expanded to accept all types of ICPC cases and developed to meet all of the ICPC needs, the Access database would no longer be necessary.

Summary

The ICPC communication and handoff process is clearly outdated and inconsistent with today's technology, making the handoffs a cumbersome process. Requirements for multiple hard copy packets, dual data entry and lack of decision support tools cause the handoff to be a problem area which have a direct impact on permanency for children. To address the issues over which Indiana has direct control, decision support tools such as clear case-specific checklists for use in all counties would minimize the delay caused by local office unfamiliarity with ICPC regulations, and at least ensure that activities within Indiana are not the cause of placement delays.

6. RECOMMENDATIONS

The following recommendations are offered to address the key concerns raised relating to Indiana's implementation of the ICPC. Recommendations were developed after careful consideration of SME expert input and review of Indiana's current laws, policies and procedures.

Policy / Procedures

1. Policy and procedure should be developed addressing data entry requirements for all ICPC cases. Data entry for all ICPC cases should be standardized, and staff should be held accountable for the data entry of this information, just as they would in any other phase in the life of the case.



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2. Develop and implement policy regarding maximum timeframes for the following to ensure the importance of addressing placement with ICPC children is no lower a priority than other children in the child welfare system:
 - a. Completion of all referral requirements;
 - b. Submission of any additional information requested by the Indiana ICPC office or other party state;
 - c. Completion of homestudies and placement decisions;
 - d. Referral review and forwarding by Indiana ICPC staff.
3. Establish clear policy related to licensing requirements for children placed in state and out of state. Prior to placement approval of a child, a hard copy of the license should be provided in addition to the homestudy approval to ensure full licensing requirements for either state have been met.
4. Evaluate staffing needs in the local offices and the Indiana ICPC office to ensure staffing levels are consistent with the growing demands on the ICPC cases -- Oftentimes, ICPC cases are a low priority, and are just one of many cases a worker in the field must manage. Though ICPC case requirements are not difficult to understand, ICPC cases may not be prevalent enough in a particular worker's caseload for them to become comfortable and knowledgeable with the requirements.
5. Establish a statewide effort to reduce the backlog of pending ICPC homestudies. As there is currently a backlog of ICPC homestudies in Indiana that have been pending since 2003, high priority should be given to complete these pending decisions.

Decision Support and Validation Tools

1. Create formal checklists for every type of ICPC referral, demonstrating what documents are required and the timelines in which steps should be completed. One tool should be functional for all levels of staff; local office, agency, supervisory and ICPC staff.
2. Incorporate ICPC module training into ICWIS training and competencies. Currently, the ICPC module is not addressed in formal ICWIS training.
3. Incorporate steps for ICWIS data entry into decision support tools developed for ICPC.
4. Develop the ICWIS module to include all ICPC cases, regardless of type, are entered and tracked in one system (ICWIS), with consistent data elements to allow the capture of complete data for tracking, reporting and decision-making purposes. If this is not possible, the possibility of linking ICWIS and the Access data system should be revisited.

Supervisory Review and Quality Assurance

1. Require local agency supervisory review of ICPC referrals prior to forwarding to the Indiana ICPC office. The decision support tools mentioned above would reduce the time wasted in reviewing incomplete referrals, and would serve as a tool to aid the supervisor in conducting Quality Assurance reviews of all ICPC referrals prior to forwarding to the ICPC office.
2. Require local agency supervisory review of homestudy assessments and placement decisions prior to forwarding to the Indiana ICPC office. Many homestudies submitted to the ICPC office lack basic requirements and incomplete home studies result in delayed placements. As mentioned above, a Quality Assurance process prior to submission of the homestudy will result in less wasted staff time and increased efficiency.



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3. Establish a formal on-going Quality Assurance process for ICPC office and local agency staff. A formal, consistent process both at the local office level and in the Central Office ICPC office would be beneficial to ensure information is being reviewed correctly and consistently.

Case Transfers

1. Develop policy to address the timeframes related to the transfer of ICPC cases from one entity to another. Though ICPC office policy exists to establish timeframes for the review and transfer of information submitted to the ICPC office, there is no standardized timeframe in state policy which addresses the amount of time that should be allotted to transfer a case from one entity to another within Indiana. This policy would provide a basis for accountability, which would in turn, ultimately impact the expediency in which children are placed in permanent homes.